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10 Attorney for Secured Creditor
11 U.S. Bank Trust National Association, as Trustee for the Igloo Series III Trust, its successors
12 and/or assignees

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14
15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 In Re:) CASE NO.: 19-30291
19 JOHN DENTONI) CHAPTER 13
20 Debtor (s).) **CONDITIONAL NON-**
21) **OPPOSITION TO MOTION TO**
22) **SELL**
23)
24)
25)
26)
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28)

1 TO ALL PARTIES IN INTEREST AND TO THEIR ATTORNEYS OF RECORD:
2
3 U.S. Bank Trust National Association, as Trustee for the Igloo Series III Trust, its
4 successors and/or assignees, ("Secured Creditor") in the above-entitled Bankruptcy
5 proceeding, hereby submits the following Objections to Confirmation of the Chapter 13 Plan
proposed by ("Debtor") John Dentoni.

6 Secured Creditor is entitled to receive payments pursuant to a Promissory Note which
7 matures on 7/1/2035 and is secured by a First Deed of Trust on the subject property commonly
8 known as 724 Miller Ave., South San Francisco, CA 94080-2527 ("Property").

9 Pursuant to 11 U.S.C. § 363(f) Secured Creditor is entitled to the full payment of their
10 claim. Secured Creditor has no Opposition to Debtor's Motion to Sell the Subject Property so
11 long as the lien of Secured Creditor is paid off in full satisfaction of the debt.

12 Based upon the foregoing, Secured Creditor respectfully requests any order granting
13 Debtor's Motion to sell include the below language:

14 The loan secured by a first lien on real property located at 724 Miller
15 Avenue, South San Francisco, CA 94080-2527 will be paid in full as of the
16 date of the closing of the sale, and the sale will be conducted through an
17 escrow and based on a non-expired contractual payoff statement received
18 directly from U.S. Bank Trust National Association, as Trustee for the Igloo
19 Series III Trust and its servicing agent, BSI Financial Services.

20
21 Dated: May 3, 2019

GHIDOTTI | BERGER LLP

22
23 /s/ Kristin A. Zilberstein
24 Kristin A. Zilberstein, Esq.
25 Counsel for U.S. Bank Trust National
26 Association, as Trustee for the Igloo Series III
27 Trust, its successors and/or assignees
28

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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

12 In Re:) CASE NO.: 19-30291
13 John Dentoni,)
14 Debtor.) CHAPTER 13
15)
16)
17)
18)
19)
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21 **CERTIFICATE OF SERVICE**

22
23 I am employed in the County of Orange, State of California. I am over the age of
24 eighteen and not a party to the within action. My business address is: 1920 Old Tustin
25 Avenue, Santa Ana, CA 92705.

26
27 I am readily familiar with the business's practice for collection and processing of
28 correspondence for mailing with the United States Postal Service; such correspondence would
be deposited with the United States Postal Service the same day of deposit in the ordinary
course of business.

1 On May 3, 2019 I served the following documents described as:

- **CONDITIONAL NON-OPPOSITION TO MOTION TO SELL**

3 on the interested parties in this action by placing a true and correct copy thereof in a sealed
4 envelope addressed as follows:
5

6 (Via United States Mail)

<p>Debtor John Dentoni 724 Miller Ave South San Francisco, CA 94080</p>	<p>Trustee David Burchard P.O. Box 8059 Foster City, CA 94404</p>
<p>Debtor's Counsel Richard L. Sturdevant Financial Relief Law Center 1200 Main St. #G Irvine, CA 92614</p>	<p>U.S. Trustee Office of the U.S. Trustee / SF Phillip J. Burton Federal Building 450 Golden Gate Ave. 5th Fl., #05-0153 San Francisco, CA 94102</p>

14 xx (By First Class Mail) At my business address, I placed such envelope for deposit with
15 the United States Postal Service by placing them for collection and mailing on that date
following ordinary business practices.

16 Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the
17 Eastern District of California

18 xx (Federal) I declare under penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct.

Executed on May 3, 2019 at Santa Ana, California

21 | *s / Enrique Alarcon*

Enrique Alarcon